

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
WESTERN DIVISION**

JANE DOE #1 on behalf of herself)	
and all others similarly situated,)	
)	
Plaintiff,)	
)	
vs.)	
)	Civil Action No.
MG FREESITES, LTD, d/b/a)	
“PORNHUB”; MG FREESITES II,)	7:21-CV-00220-LSC
LTD; MINDGEEK S.A.R.L.;)	
MINDGEEK USA)	
INCORPORATED; MG CY)	
HOLDINGS LTD; MINDGEEK)	
CONTENT RT LIMITED; 9219-)	
1568 QUEBEC INC., d/b/a)	
MINDGEEK; and MG BILLING)	
LTD,)	
)	
Defendants.)	

**EVIDENTIARY SUBMISSION IN SUPPORT OF DEFENDANTS’
MOTION FOR SUMMARY JUDGMENT**

COME NOW Defendants MG Freesites Ltd, MG Freesites II Ltd, MindGeek S.à r.l., MindGeek USA Incorporated, MG CY Holdings Ltd, MG Content RT Limited, 9219-1568 Quebec Inc., and MG Billing Limited (collectively, “Defendants”) and submit their Evidentiary Submission in Support of their Motion for Summary Judgment.

Exhibit A

Declaration of [REDACTED]

Exhibit B

Declaration of [REDACTED]

- Exhibit 1: Terms of Service, last modified May 11, 2016 (MindGeek_NDAL_00000581)
- Exhibit 2: Terms of Service, last modified May 18, 2018 (MindGeek_NDAL_00000635)
- Exhibit 3: Terms of Service, last modified March 9, 2020 (MindGeek_NDAL_00434176)
- Exhibit 4: Terms of Service, last modified September 22, 2020 (MindGeek_NDAL_00000561)
- Exhibit 5: Terms of Service, last modified December 8, 2020 (MindGeek_NDAL_00000604)
- Exhibit 6: Terms of Service, last modified as of May 5, 2021 (MindGeek_NDAL_00000536)
- Exhibit 7: Excerpt of Report (MindGeek_NDAL_00104652)
- Exhibit 8: Excerpt of Report (MindGeek_NDAL_00618039)
- Exhibit 9: July 14, 2020 Email (MindGeek_NDAL_00104606)

Exhibit C

Declaration of [REDACTED]

- Exhibit 1: [REDACTED]
[REDACTED]

Exhibit D

Declaration of Joseph Fonseca in Support of Defendants' Opposition to Plaintiff's Motion for Class Certification

Exhibit E

Transcript of August 30, 2023 Deposition of [REDACTED]
[REDACTED]

Exhibit F

Transcript of August 8, 2023 Deposition of [REDACTED]
[REDACTED]

Exhibit G

Transcript of July 12, 2023 Deposition of [REDACTED]
[REDACTED]

- Exhibit H Transcript of October 18, 2023 Deposition of [REDACTED]
[REDACTED]
- Exhibit I Transcript of September 29, 2023 Deposition of Plaintiff
Jane Doe # 1
- Exhibit J Plaintiffs' Objections and Responses to Defendants'
Second Set of Interrogatories, dated August 1, 2022
- Exhibit K Alabama Uniform Incident/Offense Report, dated July 15,
2020 (JaneDoe!_0000405-406)

Dated: September 6, 2024

Respectfully submitted,

/s/ Kevin M. McGinty

**MINTZ, LEVIN, COHN, FERRIS,
GLOVSKY AND POPEO, P.C.**

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MindGeek USA Incorporated, MG CY
Holdings Ltd, MindGeek Content RT
Limited, 9219-1568 Quebec Inc., and
MG Billing Limited*

CERTIFICATE OF SERVICE

I certify that on this day, September 6, 2024, this document was filed conventionally with the Clerk of the United States District Court for the Northern District of Alabama and will be served electronically by the Defendants to all participants of record.

/s/ Sara M. Turner

Sara M. Turner